

Exhibit 4: Exhibit 9 to Deposition of Michelle Castillo (LP_001245-57)

From: Aime Leon [aleon@libertypowercorp.com]
Sent: Thursday, July 26, 2018 10:01:59 PM
To: Albert Martinez; Gary Donaldson; Josue Toussaint; Kevin Gailing; Mike Hernandez
CC: Support 1; Michael Cofer; DL-Business Planning
Subject: RE: Katz v. Liberty Power - Calls to new Plaintiffs
Attachments: image001.png; image002.png; image003.png; image004.png; image005.png; image006.png; image007.png; image010.png; image011.png

Team;

Please see below for more information about these 3 numbers.

1. Phone number 908879- [REDACTED] has been part of the National DNC list since 2003. It was scrubbed for EAG1 on 8/30/2016 and 9/30/2016. We also received the number as part of an SMB file, and it was scrubbed for channel GPG on 4/21/2015 as an SMB number.

DNC Number Research for (908) 879- [REDACTED]

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Lists Containing Number

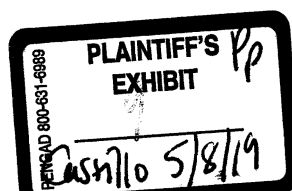
Filter	Code	Date Added	Customer Data	Date Updated	Date Removed
NEW JERSEY 908	NNJ	10/12/2003	N/A	N/A	N/A
1					Page 1 of 1 (1 items)

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Instances where number was uploaded in a Call List

Call List	File Name	Upload Date	Scrub Date	DNC Filter
Default CallList	EAG1_RESI_NJ_09.30.16.csv	9/30/2016	<u>9/30/2016</u>	NEW JERSEY 908
Default CallList	EAG1_NJ_RESI_8.30.2016.csv	8/30/2016	<u>8/30/2016</u>	NEW JERSEY 908
Default CallList	GPG_SMB_NJ_04.21.15_TO_SCRUB.csv	4/21/2015		
GLS062414171557_finalfile	GLS062414171557_finalfile.csv	6/26/2014	<u>6/26/2014</u>	NEW JERSEY 908
1				Page 1 of 1 (4 items)

2. By looking at the scrubbing history in DNC Solutions for phone number 508540- [REDACTED], we see that it was first scrubbed as a Winback for SFC. We were unable to find any history for this number in our system, but we found the Winback list that includes the number, and an account number ([REDACTED]) associated with it. When looking at this acct number in Deal Capture, the phone number is different (617742- [REDACTED]); this second phone number is not part of the National or State DNC lists (see below), but it was added to our Internal DNC list on 1/11/18. This customer has de-enrolled multiple times.



DNC Number Research for (508) 540-████

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Lists Containing Number

Filter	Code	Date Added	Customer Date	Date Updated	Date Removed
Massachusetts	MA1	6/8/2015	5/6/2018	6/6/2018	N/A
MASSACHUSETTS 508	NMA	2/4/2018	N/A	N/A	N/A
Liberty Power Corp	MST	12/11/2017	1/9/2018	1/9/2018	N/A
Liberty Power Corp	MST	4/10/2015	3/29/2017	3/29/2017	3/29/2017

1

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Instances where number was uploaded in a Call List

CallList	File Name	Upload Date	Scrub Date	DNC Filter
Default CallList	InternalDNC.csv	4/18/2018	<u>4/18/2018</u>	Massachusetts
Default CallList	Honduras_RESI_Winbacks_11.22.2017.csv	11/22/2017	<u>11/22/2017</u>	Massachusetts
Default CallList	Honduras_Winbacks_PN_10.25.17.csv	10/25/2017	<u>10/25/2017</u>	Massachusetts
Default CallList	Liberty Power Cust.csv	12/16/2016	<u>12/16/2016</u>	Massachusetts
Default CallList	MEZ_RESI_5 Series_12.14.16.csv	12/14/2016	<u>12/14/2016</u>	Massachusetts
Default CallList	MEZ_RESI_07.27.16.csv	7/27/2016	<u>7/27/2016</u>	Massachusetts
Default CallList	MEZ_RESI_07.12.16.csv	7/12/2016	<u>7/12/2016</u>	Massachusetts
Default CallList	Liberty Power Cust.csv	6/27/2016	<u>6/27/2016</u>	Massachusetts
Default CallList	Liberty Power Cust.csv	3/22/2016	<u>3/22/2016</u>	Massachusetts
Default CallList	SFC_WINBCK_phonenumbers_1.8.2016.csv	1/8/2016	<u>1/8/2016</u>	Massachusetts

1

Page 1 of 1 (11 items)

From the Winback File uploaded in PC for Call Center Outbound on 11/22/17 (the customer de-enrolled on 9/22/17, it was within the 18 months period)

PhoneNumber	Timezone	FirstName	LastName	Address	City	State	Zip	Utility	AccountNumber	De-enrollmentDate
50854061815	EST	SCOB	RHODES	107 HAYWARD	FALLMOUTH	MA	01936	NSTAR.COM	1687610016	9/22/2017

From Deal Capture:

Account Detail

Account #: 14687010016

Call-in PIN:

Billing Account #: [

New Search

Refresh

Status: 911000-De-enrolled ▼

Return to Menu

Return to Account List

1-General 2-Customer 3-Billing 4-Service 5-Owner 6-Additional 7-Notes 8-Sales C

Name: SCOPA F RHODES ▼

SCOPA F RHODES

Contact: SCOPA F, RHODES, NA ▼

First Name: SCOPA F

Last Name: RHODES

Title: NA

Phone: 617742-

Fax:

Email: admin@libertypowercorp.com

Birthday: 1 / 1

Address: East Falmouth, MA, 02536-4507 ▼

Address:

Suite:

City: East Falmouth

State: Massachusetts ▼

Zip: 02536-4507

http://enrollmentapp.libertypowercorp.com...	
Row	Detail
12/21/2017	12/21/2017
12/22/2016	9/22/2017
10/24/2016	11/22/2016
3/23/2016	7/22/2016
10/22/2015	2/23/2016
1 2	

Phone Number 617-742-

DNC Number Research for (617) 742-████

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Lists Containing Number

Filter	Code	Date Added	Customer Date	Date Updated	Date Removed
Liberty Power Corp	MST	1/9/2018	1/9/2018	1/9/2018	N/A
1					

Page 1 of 1 (1 items)

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Instances where number was uploaded in a Call List

CallList	File Name	Upload Date	Scrub Date	DNC Filter
Default CallList	InterneIDNC.csv	4/18/2018	<u>4/18/2018</u>	Liberty Power Corp
Default CallList	MEZ_RESI_10.18.2017_PN.csv	10/18/2017		
Default CallList	MEZ_RESI_09.05.17.csv	9/5/2017		
Default CallList	SEEC_MA_NSTAR_RESI_A_07.05.17.csv	7/5/2017		
Default CallList	MEZ_RESI_6 Series_12.14.16.csv	12/14/2016		
Default CallList	MEZ_RESI_07.27.16.csv	7/27/2016		
Default CallList	MEZ_RESI_07.12.16.csv	7/12/2016		
Default CallList	MEZ_RESI_MA_06.10.16.csv	6/10/2016		
SOC_1_RES_2_12_15	NSstarResiA.csv	2/12/2015		

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3. Phone number 617962-████ was scrubbed 3 times for channel MEZ in 2016.

DNC Number Research for (617) 962-████

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Lists Containing Number

Filter	Code	Date Added	Customer Date	Date Updated	Date Removed
Massachusetts	MA1	9/6/2006	6/6/2018	6/6/2018	N/A
MASSACHUSETTS 617	NMA	8/12/2006	N/A	N/A	N/A
Wireless	WIR	6/14/2003	7/20/2018	7/23/2018	N/A
1					

Page 1 of 1 (3 items)

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Instances where number was uploaded in a Call List

CallList	File Name	Upload Date	Scrub Date	DNC Filter
Default CallList	MEZ_RESI_6 Series_12.14.16.csv	12/14/2016	<u>12/14/2016</u>	Massachusetts
Default CallList	MEZ_RESI_07.27.16.csv	7/27/2016	<u>7/27/2016</u>	Massachusetts
Default CallList	MEZ_RESI_07.12.16.csv	7/12/2016	<u>7/12/2016</u>	Massachusetts

Page 1 of 1 (3 items)

Thank you,

Aimé León

Business Planning Analyst

[O] 954.598.7052

aleon@libertypowercorp.com



www.libertypowercorp.com

2100 W. Cypress Creek Rd., Suite 130
Fort Lauderdale, FL 33309

From: Albert Martinez

Sent: Thursday, July 26, 2018 3:08 PM

To: Gary Donaldson <gdonaldson@libertypowercorp.com>; Josue Toussaint <jtoussaint@libertypowercorp.com>; Kevin Gailing <kgailing@libertypowercorp.com>; Mike Hernandez <m2hernandez@libertypowercorp.com>

Cc: Support 1 <support1@libertypowercorp.com>; Michael Cofer <mcofer@libertypowercorp.com>; DL-Business Planning <DL-BusinessPlanning@libertypowercorp.com>

Subject: RE: Katz v. Liberty Power - Calls to new Plaintiffs

One of these numbers was scrubbed for the Honduras team as a winback.

	PhoneNumber	SalesChannel	DateScrubbed	ScrubResult	Description
1	508540 [REDACTED]	Call Center Outbound	2017-11-22 16:22:00.000	MA1	Massachusetts State List
2	508540 [REDACTED]	Call Center Outbound	2017-11-22 16:22:00.000	WBK	Winback

From: Gary Donaldson

Sent: Thursday, July 26, 2018 1:33 PM

To: Josue Toussaint <jtoussaint@libertypowercorp.com>; Kevin Gailing <kgailing@libertypowercorp.com>; Mike Hernandez <m2hernandez@libertypowercorp.com>

Cc: Support 1 <support1@libertypowercorp.com>; Michael Cofer <mcofer@libertypowercorp.com>; DL-Business Planning <DL-BusinessPlanning@libertypowercorp.com>

Subject: FW: Katz v. Liberty Power - Calls to new Plaintiffs

Importance: High

Guys,

I need for us to reach out to all of our active channel partners to confirm if the numbers highlighted below were ever dialed by them. I don't want to limit their search just to ensure we get everything so ask them to search from 10/2016 through June 2018. See details below and get back to me as soon as possible.

For new Plaintiff Alex Braurman, telephone # 908-879-[REDACTED]

Call Date	Time	Calling Number
10/24/2016	12:13 p.m.	(908) 387-4845
12/23/2016	1:31 p.m.	(508) 523-6101
12/24/2016	12:52 p.m.	(508) 523-6101

For new Plaintiff Lynne Rhodes, telephone #s (508) 540-[REDACTED] and (617) 962-[REDACTED]

November 2017 to June 2018

Specifically, June 21, 2018 called from 339-888-6412.

BP,

Can you also confirm any scrub requests for the numbers in question. The respective dates are also provided which should help narrow your search. Perhaps Cofer can double check Pure Cloud for us to see if there were any records returned for these numbers as well.

Thanks,

Gary Donaldson

Senior Manager, Mass Market Sales
Channel Development - Telesales

[O] 954.598.7084

[M] 954.213.9210

[F] 954.903.4663

gdonaldson@libertypowercorp.com



www.libertypowercorp.com

2100 W. Cypress Creek Rd. Suite 130
Fort Lauderdale, FL 33309

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From: Mike Hernandez [m2hernandez@libertypowercorp.com]
Sent: Tuesday, July 31, 2018 7:42:08 PM
To: Gary Donaldson; Josue Toussaint; Kevin Gailing
Subject: RE: Katz v. Liberty Power - Calls to new Plaintiffs
Attachments: image002.jpg; image004.png; image005.png; RE: Alex Braurman & Lynne Rhodes.msg

Gary,

See attached from HEL.

Thank you,

Mike Hernandez
Channel Manager
[M] 954.616.7243
m2hernandez@libertypowercorp.com



www.libertypowercorp.com
2100 W. Cypress Creek Rd., Suite 130
Fort Lauderdale, FL 33309

From: Gary Donaldson
Sent: Tuesday, July 31, 2018 3:40 PM
To: Josue Toussaint <jtoussaint@libertypowercorp.com>; Kevin Gailing <kgailing@libertypowercorp.com>; Mike Hernandez <m2hernandez@libertypowercorp.com>
Subject: FW: Katz v. Liberty Power - Calls to new Plaintiffs
Importance: High

Guys,

Still pending email confirmations for IBP, HEL and AGR-O. Please reply back to the original email sent below at 10am.

Thanks,

Gary Donaldson
Senior Manager, Mass Market Sales
Channel Development - Telesales

[O] 954.598.7084
[M] 954.213.9210
[F] 954.903.4663
gdonaldson@libertypowercorp.com



www.libertypowercorp.com
2100 W. Cypress Creek Rd. Suite 130
Fort Lauderdale, FL 33309

From: Gary Donaldson
Sent: Tuesday, July 31, 2018 10:03 AM
To: Josue Toussaint (jtoussaint@libertypowercorp.com) <jtoussaint@libertypowercorp.com>; Kevin Gailing (kgailing@libertypowercorp.com) <kgailing@libertypowercorp.com>; Mike Hernandez (m2hernandez@libertypowercorp.com) <m2hernandez@libertypowercorp.com>
Cc: Support 1 <support1@libertypowercorp.com>; Michael Cofer <mcofer@libertypowercorp.com>; DL-Business Planning <DL-BusinessPlanning@libertypowercorp.com>
Subject: RE: Katz v. Liberty Power - Calls to new Plaintiffs
Importance: High

Team,

Where are we with this request? Have we reached out to all of our active channels highlighted below? Please have them provide a screenshot of the search field reflecting that nothing was found if that's the case. This needs to be a HIGH priority item today as we expect more requests to surface from Katz's lawyers this week.

Sales Channel
AA-BPO
AFF
AGR-O
API
CES-NEW
CP360
ELE
ENH
EPROS
GOE-NEW
HEL
HEN
I2C
IBP
MEZ
SEEC
SFC-B

Thanks,

Gary Donaldson
Senior Manager, Mass Market Sales
Channel Development - Telesales

[O] 954.598.7084

[M] 954.213.9210

[F] 954.903.4663

gdonaldson@libertypowercorp.com



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Sent: Thursday, July 26, 2018 1:33 PM

To: Josue Toussaint <jtoussaint@libertypowercorp.com>; Kevin Gailing <kgailing@libertypowercorp.com>; Mike Hernandez <m2hernandez@libertypowercorp.com>

Cc: Support 1 <support1@libertypowercorp.com>; Michael Cofer <mcofer@libertypowercorp.com>; DL-Business Planning <DL-BusinessPlanning@libertypowercorp.com>

Subject: FW: Katz v. Liberty Power - Calls to new Plaintiffs

Importance: High

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For new Plaintiff Lynne Rhodes, telephone #s (508) 540- [REDACTED] and (617) 962- [REDACTED]

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Thanks,

Gary Donaldson

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Channel Development - Telesales

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the contrary is included in this message.

<LIBERTY-KATZ - FIRST AMENDED CLASS ACTION
(N0291987xA35AA).pdf.awsec>

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